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AUG 10 1983

Mr. Eric Egbers
Washington Department of Ecology
Southwest Regional Office
7272 Clearwater Lane
Olympia, WA 98504

RE: Comments on PWT's Draft Closure and Post-Closure Plan for RBT Pit.

Dear Mr. Egbers:

This letter follows EPA's draft comments transmitted to you via the Wang on July 27, 1983. The purpose of this letter is to comment on the "major" shortcomings of the Draft Closure Plan for Ridgefield Brick and Tile Site Ridgefield, Washington submitted by Pacific Wood Treating Corporation and received by EPA on July 20, 1983. EPA's comments will be presented under the following headings:

A. General Comments:

- *Plan is generally comprehensive and well done.
- *A state Consent Decree in which both EPA and WDOE would be a party would appear to be the best avenue to enforce proper care of the hazardous waste (HW) disposed at PWT in the post-closure time frame.
- *The disposal site did not qualify for interim status and therefore cannot legally be closed as an interim status facility. EPA is willing to accept, however, an environmentally sound closure alternative that includes measures equivalent to the interim status closure and post-closure requirements, if such closure and post-closure requirements can be incorporated into an EPA enforceable document such as a consent agreement. The option that most closely meets EPA's environmental concerns is Option III.
- *All the Options need to elaborate on how the native soil (clay) will be compacted as cover and/or liner material to yield a 10^{-6} cm/sec permeability.
- *Option III should call for the removal of the contaminated soil underlying the present "refuse area" down to the cement gravel.
- *The toe drain in Option III should be inside the HW cell in order to drain the cell.
- *There is a potential weakness in the design of Option III. Since the mica sand will be removed under the HW cell with no banking of the clay liner. It seems possible that GW flow may enter the cell from the mica sand layer exposed in the bank. This weakness may be remedied by banking the clay liner and extending it up to the cover on the upgradient side.
- *Leachate that is presently in the RBT pond and that is generated from the closure and post-closure activity needs to be treated as HW.

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B. Ground-water Monitoring (40 CFR 265.90-265.94):

*The unsaturated GW zone monitoring is a possible important early detection tool to determine a breach of the HW cell integrity but will not satisfy the GW monitoring requirements of RCRA. The unsaturated zone monitoring is not required by RCRA.

*PWT needs to design a GW monitoring system that is consistent with 40 CFR 265 Subpart F but which considers that this site will be closed. This system should include four monitoring wells (one up and three down). Some of these wells in the system may be the wells already identified in PWT's Preliminary GW Report.

*The above consent agreement must address possible future corrective actions if the existing ground water contamination is not abated by this closure or if post-closure monitoring documents an environmental release of HW constituents.

*The chemical parameters proposed are not totally appropriate for post-closure GW monitoring. The parameters selected should reflect the HW in the pit (e.g., Cu, Cr, As, PCP parameters, Creosote parameters, etc.).

*PWT needs to address how background GW conditions will be determined. PP scan might be appropriate to established background conditions in both up and down gradient wells.

*Sampling frequency might be quarterly for the first year and semiannually for the subsequent years with a provision for adjustment after three years if the results warrant it.

C. General Closure and Post-Closure (265.110-265.120):

*The post-closure period needs to be defined in the draft as 30 years period.

*The survey plat (40 CFR 265.119) and certification (40 CFR 265.115) should be considered closure functions and not post-closure functions.

*This Certification should also be done by an independent PE.

*The Notice in Deed to Property (40 CFR 265.119) of HW activity should be addressed in closure.

D. Financial (40 CFR 265.145):

*Since post-closure financial assurance is required, a post-closure cost estimate needs to be done by PWT.

E. Landfill Closure and Post-Closure (40 CFR 265.310):

*This section is generally well addressed.

*Draft did not address the mobility and the expected rate of migration of HW [40 CFR 265.310(c)(2)]. A literature survey may suffice.

*Draft did not describe how PWT was going to treat leachate as required by 40 CFR 265.310(d)(2). PWT did not define what is leachate.

Please call Michael Brown (442-2852) if you have questions or need clarification of the above comments.

Sincerely,

Kenneth D. Feigner, Chief
Waste Management Branch

cc: David Myer, Battelle-Northwest, Richland